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Attorneys for Plaintiff and Counterclaim Defendant  
INDIAN HARBOR INSURANCE COMPANY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

FEDERAL INSURANCE COMPANY, an  
Indiana corporation,

Plaintiff,

vs.

JEFFREY SHAW, et al.,  
Defendants.

Case No. CV 02-04548 JSW (EDL) and  
C-04-2615 JSW (EDL)  
[Related Case 04-4085]

**~~PROPOSED~~ STIPULATED ORDER  
GRANTING STAY OF INDIAN  
HARBOR V. WILLOCK (CASE NO. C  
04-2615 JSW) UNTIL FOURTEEN  
DAYS AFTER BANKRUPTCY  
COURT'S RULING ON MOTION TO  
APPROVE SETTLEMENT OF  
FEDERAL V. SHAW (CASE NO. C 02-  
4548)**

Date: TBD  
Time: TBD  
Crtrm: 2  
Judge: Hon. Jeffrey S. White

INDIAN HARBOR INSURANCE  
COMPANY,

Plaintiff,

vs.

VICTORIA WILLOCK, et al.  
Defendants.

AND RELATED CLAIMS AND  
COUNTERCLAIMS

WHEREAS, the parties to Federal Insurance Company v. Shaw, Case No. C 02-4548 (the

1 “Federal v. Shaw” action) have reached a settlement of that action;

2 WHEREAS, the settlement is conditioned upon the approval of the United States  
3 Bankruptcy Court for the Northern District of California, as reflected in a Memorandum of  
4 Understanding dated May 27, 2005;

5 WHEREAS, the parties to the action entitled Indian Harbor Insurance Company v.  
6 Willock, Case No. C 04-2615 (“Indian Harbor v. Willock action”), which was consolidated with  
7 the Federal v. Shaw action, believe that the Bankruptcy Court approval of the settlement of the  
8 Federal v. Shaw action will facilitate the resolution of the Indian Harbor v. Willock action;

9 WHEREAS, the parties believe that continued discovery, motions practice and trial  
10 preparation in the Indian Harbor v. Willock action pending Bankruptcy Court approval will result  
11 in the waste of the Court’s and the parties’ resources;

12 The parties do therefore stipulate to a stay of the Indian Harbor v. Willock action until  
13 fourteen (14) days after the United States Bankruptcy Court for the Northern District of  
14 California rules upon the motion for approval of the settlement of the Federal v. Shaw action.

15 IT IS SO STIPULATED.

16 Dated: June 22, 2005

Robert M. Pozin  
Terrence R. McInnis  
Julia C. Weissman  
ROSS, DIXON & BELL, LLP

19 By: Robert M. Pozin  
Attorneys for Plaintiff and Counterclaim  
20 Defendant INDIAN HARBOR INSURANCE  
21 COMPANY

22 Dated: June 22, 2005

LOVITT & HANNAN, INC.

23 John J. Bartko  
24 Charles G. Miller  
25 Christopher D. Sullivan  
BARTKO, ZANKEL, TARRANT & MILLER

26 By: Christopher D. Sullivan  
27 Attorneys for Defendants and Counterclaimants  
28

1 Having received, read and considered the ex parte application to stay proceedings in  
2 Federal Insurance Co. v. Shaw, No. C 02-4548, and the papers filed thereon, and having received,  
3 read and considered the Joint Response of Indian Harbor Insurance Company and the Defendants  
4 and Counterclaimants Re: Ex Parte Application to Stay Action, and good cause appearing  
5 therefore,

6 PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that the Indian Harbor v.  
7 Willock action, including discovery and other deadlines in this action, shall be stayed until  
8 fourteen (14) days after such time as the United States Bankruptcy Court for the Northern District  
9 of California rules upon the motion to compromise controversy between the parties in Federal  
10 Insurance Co. v. Shaw et al. The parties in Indian Harbor v. Willock will report to this Court  
11 within fourteen (14) days after such Bankruptcy Court ruling, concerning whether any further  
12 proceedings in Indian Harbor v. Willock are necessary.

13  
14 DATED: June 23, 2005

15 /s/ Jeffrey S. White

16 THE HONORABLE JEFFREY S. WHITE  
17 JUDGE OF THE DISTRICT COURT  
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CERTIFICATE OF SERVICE

UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA  
Case Name: Federal Insurance Company v. Jeffrey Shaw, et al., Case No. CV02-04548  
consolidated with Indian Harbor Insurance Company v. Victoria Willock, et al., Case No.: C 04-02615

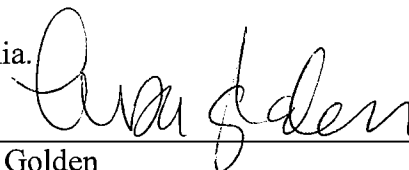
STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 5 Park Plaza, Suite 1200, Irvine, California 92614.

I hereby certify that on the 22nd day of June, 2005, a copy of the foregoing "[PROPOSED] STIPULATED ORDER GRANTING STAY OF INDIAN HARBOR V. WILLOCK (CASE NO. C 04-2615 JSW) UNTIL FOURTEEN DAYS AFTER BANKRUPTCY COURT'S RULING ON MOTION TO APPROVE SETTLEMENT OF FEDERAL V. SHAW (CASE NO. C 02-4548)" was filed electronically with this Court. Notice of this filing will be sent to all parties and their attorneys by operation of the Court's electronic filing system.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on June 22, 2005, at Irvine, California.

  
\_\_\_\_\_  
Lisa Golden